
Policy: Gifts, Invitations & Hospitality Policy

1. SUMMARY

- 1.1. This policy defines WINNS Services Gifts, Invitations & Hospitality Policy to ensure it meets requirements.
- 1.2. The Operations Director is responsible for implementation and management of the Gifts, Invitations & Hospitality Policy

Rev.	Date	Nature of Changes	Approved By
1	26/11/ 2019	Original issue.	C Stebbing
2	7th September 2021	General Updates	C Stebbing

POLICY: Gifts, Invitations & Hospitality Policy

2.POLICY STATEMENT

Gifts, Invitations & Hospitality should not be accepted where they may appear to be disproportionately generous or could reasonably be construed as an inducement to affect a business decision.

Directors (Executive and Non-Executive) and employees involved in procurement, sales, bid related activities and lobbying need to be particularly aware of this policy as the giving or receiving of Gifts, Invitations & Hospitality can be perceived or construed negatively which might impact on the reputation of the individual and Company.

3.DEFINITIONS

“Agent”: Any individual acting as an agent, paid by the company, acting on the company’s behalf in negotiating with Third Parties.

“Bribery” / “Corruption”: Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through Third Parties.

“Company”: All subsidiaries and affiliated companies.

“Conflict of Interest”: Occurs when an individual or organisation is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another.

“Donation”: A Donation is a voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for which no return service or payment is expected or made. Contributions to industry associations or fees for memberships in organisations that serve business interests are not necessarily considered Donations.

“Employee”: For the purposes of this policy this includes all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or joint ventures or their employees, wherever they are located.

“Facilitation Payments”: A form of bribery in which small payments are made with the purpose of expediting or facilitating the performance by a Public Official of a routine governmental action and not to obtain or retain business or any other undue advantage. Facilitation payments are

typically demanded by low level and low income Public Officials in exchange for providing services to which one is legally entitled without such payments.

“Gifts, Invitations & Hospitality”: Invitations to social functions, sporting events, meals and entertainment, gifts or customary tokens of appreciation.

“Intermediary”: Includes but is not limited to Agents, distributors, consultants, sales representatives, implementation partners, sales partners.

“Kickback”: A bribe to obtain an undue advantage, where a portion of the undue advantage is 'kicked backed' to the person who gave, or is supposed to give, the undue advantage.

“Public Official”: Officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administrate public functions.

“Sponsorship”: Sponsorship is about partnering with external organisations to deliver mutual benefits through an exchange of monies, products, services, content or other intellectual property.

“Third Party”: Any individual or organisation you come into contact with during the course of your work for us. This includes actual and potential clients, customers, suppliers, business contacts and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

4.SCOPE

This policy applies to all employees and third parties of the Company in all countries or territories and shall be communicated to them at the outset of our business relationship and as appropriate thereafter.

5.WHAT DOES THIS MEAN?

No gifts, invitations, hospitality, donations or sponsorship shall be made or accepted by any employee in circumstances where it could be regarded as likely to influence the outcome of any business transaction or impact upon an employee's business judgement.

Under no circumstances may any employee, in or relating to the course of his/her employment, accept or offer personal services, or any gifts of cash or cash equivalents (such as bank cheques or vouchers).

Business-related gifts, invitations & hospitality (such as lunch, dinner, sporting events) may only be permitted where:

- the purpose is to hold a bona fide business discussion or to develop better business relations, not to create any form of obligation
- the entertainment was openly offered and not solicited
- it is infrequent, reasonable, proportionate, of modest value and can be reciprocated
- in the case of entertainment or hospitality, the provider of the entertainment or hospitality is present; and it is not otherwise prohibited by this policy or any other Company policy.

The offer or provision of a gift, invitations or hospitality to an associated family member of the provider or employee of any value requires the prior written approval of the duly authorised Executive of the applicable Company.

No gifts, invitations or hospitality shall be made to or accepted from Public Officials without prior approval of a duly authorised Executive of the Company.

The practice of giving business gifts varies between countries and regions and, in many instances, it is a culturally accepted part of doing business. The test to be applied is whether in

all the circumstances the gift, invitation or hospitality is reasonable and justifiable. The intention behind the gift, invitation or hospitality should always be considered.

6.YOUR RESPONSIBILITIES

It is your responsibility to log all gifts, invitations & hospitality offered, received or given in the Gifts, Invitation & Hospitality Register which can be found in the MD office, Details that should be included:

- Name and position
- Name and organisation of the offeror and offeree
- A description of the gift, invitation or hospitality
- The estimated value of the gift, invitation or hospitality
- Whether approval has been given by the appropriate parties outlined in this policy
- The name and job title of the approver (if applicable)

Each member of staff has a personal responsibility to ensure that an audit trail exists for all offers of gifts, invitations or hospitality.

Any gift, invitation or hospitality proposed to be offered, given or accepted which does not meet the above standard requirements should be discussed in advance with your line manager and approval sought from CEO.

All employees have the responsibility to read, understand and comply with this policy. You should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.

Any employee working on, or likely to come into contact with, a bid, tender, or contract negotiation process should take particular care about the timing of offering or receiving gifts, invitations & hospitality to minimise the risk of any improper influence on the process. Examples would include roles in procurement, sales and marketing.

This policy applies to all Directors as if they were all employees of the Company. In addition, Directors must not accept any benefit from a third party which he or she receives because they are a Director of the Company except where the benefit cannot be reasonably regarded as likely to give rise to a conflict of interest.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

This policy should be read in conjunction with the Company's Anti Bribery & Corruption Policy, Conflicts of Interest Policy and Code of Ethics.

Employees are encouraged to raise concerns about any instance, or suspicion of malpractice at the earliest possible stage through their line manager or other available reporting mechanisms Whistle Blowing Policy.

7.GOVERNANCE

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

WINNS Services shall maintain a Register of Gifts, Invitations & Hospitality and shall make this available for inspection as required. The register shall be provided for inspection by the CEO annually immediately before the Board Meeting each year and attendees shall confirm at that Board Meeting that they have inspected the register. Any questions or issues arising from the inspection shall be followed-up with the CEO by the Board.

8.MONITORING AND REVIEW

The Company will establish and put in place appropriate performance measures and reporting systems to monitor performance against metrics and compliance with the relevant policies, procedures and controls.

WINNS Services will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective. WINNS Services will report to the CEO at least annually on the application of this policy.